

EXHIBIT A

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
3 CHARLESTON DIVISION

4 IN RE: ETHICON, INC. Master File No.
5 PELVIC REPAIR SYSTEM PRODUCTS 2:12-MD-02327
6 LIABILITY LITIGATION MDL 2327

7 This document relates to JOSEPH R. GOODWIN
8 the cases listed below: U.S. DISTRICT JUDGE

9 Mullins, et al. V. 2:12-cv-02952
10 Ethicon, Inc., et al.
11 Sprout, et al. V. 2:12-cv-07924
12 Ethicon, Inc., et al.

13 Iquinto v. Ethicon, 2:12-cv-09765
14 Inc., et al.
15 Daniel, et al. V. 2:13-cv-02565
16 Ethicon, Inc., et al.

17 Dillon, et al. V. 2:13-cv-02919
18 Ethicon, Inc., et al.
19 Webb, et al. V. 2:13-cv-04517
20 Ethicon, Inc., et al.

21 Martinez v. Ethicon, 2:13-cv-04730
22 Inc., et al.
23 McIntyre, et al. V. 2:13-cv-07283
24 Ethicon, Inc., et al.

25 Oxley v. Ethicon, 2:13-cv-10150
 Inc., et al.
 Atkins, et al. V. 2:13-cv-11022
 Ethicon, Inc., et al.

 Garcia v. Ethicon, 2:13-cv-14355
 Inc., et al.

 VIDEOTAPED DEPOSITION OF JUAN C. FELIX, MD
 October 3, 2015
 (CAPTION CONTINUES ON FOLLOWING PAGE)

<p style="text-align: right;">Page 58</p> <p>1 THE WITNESS: Correct. So I -- I cannot say 2 that all of the meshes -- mesh explants that I 3 evaluated, I cannot say that a hundred percent of 4 them, the woman was not experiencing pain. 5 But I know for a fact that the women 6 with -- who got operated, the vast majority of the 7 women who got operated for urinary obstruction were 8 not experiencing pain, because that got discussed 9 quite extensively. 10 BY MR. MONSOUR: 11 Q Okay. If we go down a little farther, it 12 says: 13 "A small fraction of the samples were 14 removed for mesh exposure or erosion. In 15 these instances, patients experienced the 16 discomfort of mesh rubbing against their 17 vulva, but rarely, if ever, pain." 18 Did I read that correctly? 19 A Yes. 20 Q Okay. I'm just confused by that. 21 How could the mesh be rubbing against 22 their vulva? 23 A So I'll go through some anatomy. 24 Usually, the sub- -- the suburethral space 25 in the vagina is very close to the introitus.</p>	<p style="text-align: right;">Page 60</p> <p>1 Q Okay. 2 A Yeah. I mean, at the time when we were 3 looking at these and even to this day, you know, the 4 reason for these meshes coming out, and more 5 importantly, what happens to the woman after the 6 mesh comes out is of great interest to everybody 7 involved. 8 Q Okay. 9 A So we discuss it. And, you know, mesh 10 explants, they all look very similar. I mean, 11 they're -- 12 Q Okay. 13 A -- stunningly similar. 14 Q All right. The only thing I'm trying to 15 establish is when you're talking about this 16 information that you've got on page 16 of your 17 report and going over onto page 17, that's all from 18 memory; you didn't go back and rereview the slides. 19 That's straight from your memory; correct? 20 A That is -- that is correct. 21 Q Okay. Let's flip over to page 17. 22 If you look at the second bullet point, 23 midway through that second bullet, it says: 24 "Differences in tissue shrinkage when 25 exposed to formalin fixative can account</p>
<p style="text-align: right;">Page 59</p> <p>1 The labia minora frequently folds in, and 2 that's the part where patients will say that they 3 feel the roughness of the -- of the mesh when it is 4 exposed. 5 Q I thought the vulva was considered just to 6 be the outside portion of the vagina. 7 A Yeah, no. The vulva starts at the 8 hymeneal ring. So the entrance -- the beginning of 9 the vagina is the hymeneal ring. Everything outside 10 of the hymeneal ring or where the hymen used to be 11 is vulva. 12 Part of the vulva looks a lot like vagina 13 but is not. 14 Q Okay. Now, do you have any -- if I read 15 this -- what you've got here on page 16, you've 16 got -- you talk about these explants that you've 17 looked at. Are you pretty much just -- is this just 18 from your memory that you -- that you're -- that 19 you're writing this, or did you keep records that 20 you went back and referenced? 21 A It was mostly from memory. 22 Q Okay. Was any of it -- did you go back 23 and look at any records to try and recapture this 24 information? 25 A I didn't really need to. It's --</p>	<p style="text-align: right;">Page 61</p> <p>1 for most if not all of Dr. Iakovlev's 2 findings regarding nerves in explanted mesh 3 samples." 4 Do you see that? 5 A Yes. 6 Q And again, that shrinkage that you're 7 referencing, that's shrink that you're saying takes 8 place after these explants are removed from the 9 body; correct? 10 A Yes, you're correct. 11 Q And then you also note, "These differences 12 can artifactually cause the shape of the nerve to 13 lose its normal circular or cylindrical appearance." 14 Did I read that correct? 15 A Yes. 16 Q So when you looked at some of 17 Dr. Iakovlev's slides, you noticed some nerves that, 18 in your opinion, were irregularly shaped; correct? 19 A Yes. 20 Q And you're saying the reason for the 21 irregular shapes is because of the process that 22 these go through when there's formalin added to 23 them? 24 A Yes. You see that type of shape in 25 nerve -- in nerves in all tissues when you expose</p>